

## **BOARD OF SUPERVISORS**

COUNTY GOVERNMENT CENTER, Room 370 • SAN LUIS OBISPO, CALIFORNIA 93408-2040 • 805.781.5450

January 10, 2006

Selica Potter, Acting Clerk of the Board State Water Resources Control Board P.O. Box 100 Sacramento, CA 95812-0100 SHIRLEY BIANCHI SUPERVISOR DISTRICT TWO

Subject: Comment Letter - 1/31/06 Board Workshop on Salinity

Members of the Board:

We are pleased to submit these comments to the State Board for consideration at your January 31, 2006 workshop on salinity issues in the Central Valley.

Although several aspects of this issue are of interest to the San Luis Obispo County region, the focus of our comments concerns the range of solutions to the salinity issue that are being considered by various interests in the valley. As your Board is aware, the United States Bureau of Reclamation is in the process of crafting responses to comments received on the draft Environmental Impact Statement (EIS) for the San Luis Drainage Feature Reevaluation project. Among other alternatives, the EIS proposes disposal of untreated agricultural drainage water into the Pacific Ocean in Estero Bay, off-shore of San Luis Obispo County. A review of comment letters addressing this "ocean disposal" alternative illustrates the almost complete lack of appropriate scientific or policy analysis that was used to develop the proposal. The California Coastal Commission and the Central Coast Regional Water Quality Control Board have submitted comment letters indicating that the ocean disposal alternative is inconsistent with both the National Pollutant Discharge Elimination System and the California Coastal Act. Our own review of the alternative indicates that it is likely inconsistent with numerous requirements of state and federal water quality laws and regulations.

The ill-conceived proposal to pump copious amounts of severely contaminated water over 200 miles and dump it into coastal waters in close proximity to communities, a National Estuary, and a National Marine Sanctuary has generated a significant level of concern along the San Luis Obispo coast. This concern is focused not only on the proposal itself, but also on the apparent lack of any statewide policies for dealing with an issue that has plagued the central valley for decades. Clearly, the antiquated approach to the disposal of polluted water by simply dumping it in the largest water body available is an affront to responsible public policy and scientific knowledge in both the water quality and water supply arenas.

San Luis Obispo County agencies and citizens are working hard to protect and enhance the resources of this region. Water quality in streams, lakes and certainly the ocean is a top priority. We believe our goals and objectives in this area are consistent with those being promulgated by the State Water Resources Control Board and the Central Coast Regional Water Quality Control Board, along with numerous other state and federal regulatory agencies concerned with the health of the aquatic environment.

We implore your Board to develop statewide policies that clearly establish that the exportation of pollution is unacceptable in California. Projects like the San Luis Drain Ocean Disposal Alternative must not be allowed to proceed. Policies to prevent the waste of public and private resources to develop and dispute such proposals must be put in place immediately.

Sincerely,

SHIRLEY BIANCHI

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cc: San Luis Obispo County Flood Control and Water Conservation District, Water Resources Advisory Committee